

NCUA Board Secretary
Mary Rupp

April 3, 2009

Dear Ms. Rupp,

I am the President/CEO of a small \$39 million dollar state chartered federally insured credit union. While the current action of the NCUA board to shore up Wescorp appears on the surface to be necessary, the natural person credit unions directly bearing the cost negatively effects hundreds of credit unions in the Western states. Smaller size credit unions are most negatively affected by the recent NCUA decisions with decreased net worth and impact on earnings. I am a long time fierce proponent of the cooperative nature of credit unions. The fact that I must now pay into the system to some extent seems reasonable, though the decisions recently made by the Board at the NCUA at the recommendation of NCUA management will cost our credit union, and thereby our members in our local community during a period of greater unemployment, a deepening recession and a dramatic decline of personal assets.

My pressing concern is the proposed re-structuring of the corporate system as a result of the current action. Small credit unions, like mine, rely heavily on the expertise, resources, and services that the corporate credit union system provides.

The following is a list of services we currently utilize at our corporate:

- Market daily account for liquidity and deposit needs
- Line of credit to back up liquidity needs
- Member share draft/item processing-returns, resubmits, settlements
- Cash services
- Wire transfer services
- Settlement services for ATM, ACH, Debit, Visa and other payments
- Check imaging and retrieval
- Investments/Certificates
- Educational resources

These services offer small credit unions a competitive edge in the open marketplace due to their cooperative pricing and accessibility. If I was not able to receive these services in this manner it would change my business plan considerably. Where else would I go? And, how much more would my credit union have to spend for these services? I don't see viable option to our corporate credit union system, especially in today's economic conditions.

I appreciate this opportunity to share with you the benefits corporate credit unions bring to the small credit union cooperative community and also ask that you carefully consider the impact of the NCUA's proposed rules regarding the proposed Corporate Stabilization Program could ultimately have on our entire natural person credit union industry.

Sincerely,
Bonni Bergstrom, President/CEO
Dow Great Western Credit Union